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RECEIVED

Madai Corral
By Madai Corral at 3:59 pm, Nov 12, 2021

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November 12, 2021

Gregory Chakalian, Hearing Officer
New Mexico Environment Department
Resource Protection Division
P.O. Box 5469
Santa Fe, NM 87502
Email: gregory.chakalian@state.nm.us

RE: NMED v. BL Santa Fe, LLC, and HRV Hotel Partners, LLC
SWB 20-01(CO)

Dear Mr. Chakalian,

Our firm has just been retained to represent BL SANTA FE, LLC by its new owners. Please be advised that, pursuant to a plan of reorganization confirmed in Case No. 21-11190 (MFW) styled *In re: BL SANTA FE, LLC, et al*, in the United States Bankruptcy Court for the District of Delaware, effective as of October 29, 2021, Juniper BL HoldCo, LLC (“Juniper”), is the sole owner of BL Santa Fe, LLC. Our firm has been engaged by Juniper to represent BL Santa Fe, LLC in the matter New Mexico Environment Department Resource Protection Division v. BL Santa Fe, LLC, and HRV Hotel Partners, LLC, Respondents, No. SWB 20-01(CO). Our firm does not represent HRV Hotel Partners, LLC.

Because this matter was unknown to exist by the new owners until very recently, we were unaware of the existence of the most recent order until today. We apologize for not filing a formal notice of appearance, and will do so next week, but we wanted to provide a response by today’s deadline.

We look forward to properly addressing this matter in the very near future.

Sincerely,

Snell & Wilmer

/s/ Mitchell Klein

Mitchell Klein
Partner

Snell & Wilmer

Gregory Chakalian
November 12, 2021
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MK:ps

cc via email to:
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